UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

BECKLEY DIVISION

UNITED STATES OF AMERICA,

V. Case No.: 5:24-cr-00123-001

The Honorable Joseph R. Goodwin

JACOB AARON BOOTHE,

Defendant.

MOTION TO CONTINUE SENTENCING HEARING AND ALL RELATED DEADLINES

Comes now the defendant Jacob Aaron Booth, by and through counsel, John J. Balenovich, Esq., and files this motion to continue the scheduled sentencing hearing and all related sentencing deadlines. As grounds for this motion, the defendant offers the following:

- 1. The sentencing hearing is scheduled for June 9, 2025, at 11:00 a.m.
- 2. Counsel will be returning to West Virginia from out of state on June 8, 2025, and that return trip could extend into June 9, 2025.
- 3. Out of an abundance of caution, counsel is seeking to continue this case until July 9, 2025. Counsel has confirmed with the United States that all attorneys involved in this case will be present in Charleston, West Virginia on that date.
- 4. The undersigned attorney has conferred with counsel for the United States, Ms. Siscaretti, and Ms. Siscaretti has permitted counsel to represent to the Court that the United States does not object to Mr. Boothe's continuance request.

WHEREFORE, defendant Jacob Aaron Boothe, by and through counsel, John J. Balenovich, Esq., respectfully requests that this Honorable Court enter an Order continuing all the sentencing related deadlines and the sentencing hearing until July 9, 2025.

Respectfully Submitted,

JOHN J. BALENOVICH, ESQ. West Virginia Bar No.: 10179

John J. Balenovich Law Offices, LC 1554 Kanawha Blvd., East Ste. 100 Charleston, West Virginia 25311

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CERTIFICATE OF SERVICE

On June 4, 2025, I, John J. Balenovich, Esq., certify that I served a true and accurate copy of the attached <u>Motion to Continue Sentencing Hearing and all Related Deadlines</u> and <u>Certificate of Service</u> by electronic filing same with the Clerk of the Court using the CM/ECF system which will send notifications of such filing to the following, at the following address:

CHRISTINE M. SISCARETTI, ESQ.
Deputy Chief of Operations
U.S. Department of Justice
Criminal Section, Civil Rights Division
950 Pennsylvania Ave NW
Washington, DC 20530
Phone: (202) 598-9605

E-mail: christine.siscaretti@usdoj.gov

Respectfully Submitted

JOHN J. BALENOVICH, ESQ. West Virginia Bar No.: 10179

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